

From: [Smalley, Bryant](#)
To: [Sams, Michael K CIV](#)
Cc: [Perry, Chris](#); [Crossland, Ronnie](#); [Smith, Monica](#); [Althea Foster](#); [Susan Webster](#)
Subject: RE: Oil/Gas Production Platform–LAKE PONTCHARTRAIN, LA -- request
Date: Tuesday, October 17, 2017 9:23:00 AM

Mike – I apologize, I was typing too fast and typed your last name. Didn't want to create confusion.

Bryant

From: Smalley, Bryant
Sent: Tuesday, October 17, 2017 9:10 AM
To: 'Sams, Michael K CIV' <Michael.K.Sams@uscg.mil>
Cc: Perry, Chris <Perry.Chris@epa.gov>; Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Monica <smith.monica@epa.gov>; Althea Foster <Foster.Althea@epa.gov>; Susan Webster <Webster.Susan@epa.gov>
Subject: RE: Oil/Gas Production Platform–LAKE PONTCHARTRAIN, LA -- request

Sam – Sorry for the delay responding to your email. See my comments below:

Working to confirm and/or obtain:

1. Natural gas pipeline is regulated by LDNR - I would assume LDNR, but we will have to verify.
2. OSHA, EPA and LDNR will lead the joint accident investigation. - EPA Region 6, Enforcement Division has the lead on General Duty violations and coordinates with OSHA.
3. Construction details for this particular barge (photos, diagrams, etc)...double-sided and single-skin bottom? - I have attached a copy of the most recent FRP the company has on file with EPA. As with USCG FRPs, these plans can include PII and CBI, so please maintain confidentiality.
4. Specific EPA regs that govern these operators. -40 CFR Part 112 applies to this facility and includes SPCC & FRP Regulations.
5. Estimate from EPA on the number of these type facilities within coastal LA. - As discussed on the phone, we will put numbers together specific to barge facilities (storage and Structural) and we can discuss at the upcoming RRT meeting in Addison.

Let me know if we can assist in any way,

Bryant Smalley
Oil Spill & Response Team Leader
US EPA R6
214-215-1783

-----Original Message-----

From: Sams, Michael K CIV [<mailto:Michael.K.Sams@uscg.mil>]
Sent: Tuesday, October 17, 2017 8:21 AM
To: Perry, Chris <Perry.Chris@epa.gov>; Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smith, Monica <smith.monica@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>
Subject: Oil/Gas Production Platform–LAKE PONTCHARTRAIN, LA -- request

Good Morning,

Is anyone able to answer below request for information? In addition to yesterday's request (pls see below forwarded email) I've read that the LA State Police HAZMAT Division will be conducting an investigation. Is this the only agency conducting an investigation?

I attached photo depicting burnt residual oil.

V/r,

Mike Sams
504-671-2234 (o)
281-881-6193 (c)
Michael.K.Sams@uscg.mil

-----Original Message-----

From: Sams, Michael K CIV
Sent: Monday, October 16, 2017 3:48 PM
To: 'Perry, Chris'
Cc: 'Crossland, Ronnie'; Smith, Monica; smalley.bryant@epa.gov
Subject: Oil/Gas Production Platform-LAKE PONTCHARTRAIN, LA

Hi Chris,

Below are items I'd like to chat with you about - when you have time.

Current situation:

- * 1 person remains missing
- * Fire appears to be out (per late morning overflight)
- * Only observed pollution so far is what appears to be burnt oil residue
- * OSRO is on scene and will be conducting cleanup
- * SCAT continues; do not anticipate much recoverable pollution
- * OSHA inspectors have arrived o/s; talking with the RP and their attorneys
- * CDR Ford will participate in 1600 press conference

Incident background:

1. This oil/gas production platform is jointly regulated (federally) by the EPA and USCG
2. EPA is the primary federal regulatory agency
3. The USCG regulates this facility under 33 CFR 154 (facility reportedly

conducts a couple transfers a year under USCG regulations)

4. LDNR is the lead LA state regulatory agency

5. Permanently moored barge (being used as a storage tank) is common for these small production facilities thru out coastal LA

6. Daily production rates for this fixed facility: 100 bbls of oil per day; 300 Mcf of natural gas per day (1 Mcf equals 1,000 cubic feet of natural gas, thus this facility produces 300,000 cubic feet of natural gas per day).

7. The facility had two 400 bbl storage tanks on the top level; one containing produced water remains mostly intact; the slop oil tank was largely consumed in the fire.

Working to confirm and/or obtain:

1. Natural gas pipeline is regulated by LDNR

2. OSHA, EPA and LDNR will lead the joint accident investigation

3. Construction details for this particular barge (photos, diagrams, etc)...double-sided and single-skin bottom?

4. Specific EPA regs that govern these operators

5. Estimate from EPA on the number of these type facilities within coastal LA

V/r,

Mike Sams

504-671-2234 (o)

281-881-6193 (c)

Michael.K.Sams@uscg.mil